

Manuel Moses, Esq.  
Moses Law Office of New York PLLC  
236 West 26<sup>th</sup> Street Suite 303  
New York, New York 10001  
(212) 736-2624 ext. 11  
(212) 981-0528 Fax.  
[manuelmoses@icloud.com](mailto:manuelmoses@icloud.com)

August 11, 2025

Hon. Robert M. Levy  
United States Court Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Marques v. Indian Taj. Inc. d/b/a Santoor Indian Restaurant, Et. Al.  
Case No. 1:20-cv-05855-DG-RML

**Limited Objection to the Report and Recommendation of August 11, 2025**

Your Honor:

I represent Defendant Kirpal Singh. On July 21, 2025, our motion to dismiss was referred to you as part of the report and recommendation to be made to Hon. Diane Gujarati U.S. Dist. Judge. Our motion was not addressed in your report and recommendation. The arguments put forth were substantially similar to the other defendants.

On page 5, of the report, you stated: “The issue to be resolved is whether Santoor at 257-05 Union Turnpike in Glen Oaks, New York was defendant’s actual place of business on May 18, 2021.”

On page 8, of your report you said: “Finally, Defendants have provided the affidavit of an attorney named Mandeep Kaur, who states that in September 2020 he represented the owners of Indian Taj Inc. in connection with the sale of Santoor. (Affidavit of Mandeep Kaur, sworn to January 9, 2025, Dkt. No. 41-8 ¶ 2.) According to the closing documents from the sale the owners of Indian Taj Inc at the time were Kirpal Singh and Harminder Singh.”

That is correct, and my client Kirpal Singh also sold his interest at that time. See the affidavit of John Gianitelli his son-in-law who attended the closing and the wife of Kirpal Singh who is Jugraj Kaur both attesting to the fact that the restaurant was sold in September 2020.

**In Conclusion:** It is respectfully requested that the motion to vacate the default judgment and dismiss the claims against Kirpal Singh with prejudice as now being time barred be recommended.

Respectfully Submitted,

*Manuel Moses*

Manuel Moses, Esq.